



*Consulting Engineers  
and Scientists*

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December 9, 2013  
(PBW Project No. 1651)

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Mr. Stephen Tzhone  
Remedial Project Manager, 6SF-RA  
U.S. Environmental Protection Agency Region 6  
1445 Ross Avenue  
Dallas, Texas 75202

Re: Bi-Monthly Progress Report, R&H Oil/Tropicana Energy Site, San Antonio, Texas

Dear Mr. Tzhone:

Pursuant to Section IX, Paragraph 37 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this bi-monthly progress report on behalf of the Respondents named in the Settlement Agreement. In accordance with the Settlement Agreement requirements, this progress report addresses the topics listed below:

1. Actions which have been taken to comply with the Settlement Agreement during the preceding two-month period – The following actions were taken during the previous two-month period:
  - Investigation Derived Waste (IDW) was sampled for profiling. Approval for use of the Waste Management Covel Gardens Landfill was received from EPA September 26, 2013.
  - PBW met with representatives from EPA, TCEQ and EA Engineering on October 31, 2013 to discuss EPA and TCEQ comments on the Baseline Human Health Risk Assessment (BHHRA).
  - The scope of the additional investigation activities to address EPA and TCEQ comments on the BHHRA has been evaluated and a Work Plan Refinement Notice is being prepared for submittal.
  - The Remedial Investigation report is currently being prepared.
2. Quality-assured results of sampling, tests and all other quality-assured data received by Respondents during the preceding two-month period – No quality-assured data were received during the preceding two month period.

3. Work planned for next two months with schedules relating such Work to the overall project schedule for RI/FS completion – The following work is planned for the next two months:

- Drum Removal – drums of investigation derived waste (soil and groundwater) will be removed from the Site and disposed of.
- PBW and other Respondent representatives will attend and participate in the Community Open House to be conducted on December 3, 2013.
- Preparation of the RI Report and Feasibility Study are ongoing.
- The aforementioned Work Plan Refinement Notice will be submitted for approval and signatures.
- The additional investigation activities identified in the Work Plan Refinement Notice to complete the BHHRA will be initiated.

The additional investigation activities are anticipated to require four months to complete, which will affect the overall RI/FS schedule accordingly.

4. Problems encountered, anticipated problems, actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays – No problems or delays were encountered or anticipated during the preceding two-month period.

Thank you for the opportunity to submit this progress report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor P.E.  
Principal Engineer



Tim Nickels  
Senior Scientist

Mr. Stephen Tzhone

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cc: Mr. John Flores – Texas Commission on Environmental Quality (TCEQ)  
Mr. Jeff Adamson – Flint Group Incorporated  
Ms. Leslie Alexander – de maximis, inc.  
Mr. Brad Bredezen – Structural Metals, Inc.  
Mr. Lee Bishop – Exxon Mobil Corporation  
Mr. Gary Elkin – BAE Systems Resolution, Inc.  
Mr. Jack Healy – Perkin Elmer Automotive Research, Inc.  
Ms. Heidi Hughes Bumpers – Jones Day  
Mr. Paul Kirkpatrick – Commercial Metals Company  
Mr. Earl Moran – Exxon Mobil Corporation  
Mr. James Morriss, III – Thompson & Knight, LLP  
Ms. Eva O'Brien – Norton Rose Fulbright, LLP  
Mr. Peter Schreck – Flint Group Incorporated  
Ms. Mary Smith - Office of the Attorney General of Texas  
Mr. Robert Sterrett – Itasca Denver, Inc.  
Mr. Rudy Valdes – National Radiator  
Mr. Randy Walker – Structural Metals, Inc.  
Ms. Elizabeth Webb – Thompson & Knight, LLP